

BRIAN -

5 DEC 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

PERLY TO ASSISTANCE OF

J.P. O'CONNELL

Mr. John P. O'Connell President Motor Oils Refining Company 7601 West 47th Street Mc Cook, IL 60525

DEC 6 1983

Re: Part B Application ILD006468669

Dear Mr. O'Connell:

Thank you for your September 8 and September 21, 1983 responses to our July 27, 1983 request for additional information relative to the above-referenced facility's Part B pennit application.

We have reviewed the additional information submitted and have determined that you have not responded adequately to our request for submission of an appropriate financial assurance for closure, as required by 40 CFR Section 264.143. My staff has transmitted this to you verbally on September 27 and October 26, 1983, at which times you indicated that the document was being prepared. To date, we have not received that document and request that you submit it by December 9, 1983.

Although your submission to date is still considered incomplete, we have initiated the "adequacy review", during which we analyze the technical aspects of the application, in order to make a tentative decision to either prepare a draft permit or deny the application. Attached is a list of questions, the answers of which would aid us greatly during this technical review process. Please provide answers to these by December 30, 1983.

If you have any questions, please feel free to contact Mrs. Edith M. Ardiente of my staff, at (312) 886-0984.

Sincerely,

William H. Miner, Chief

-- Technical, Permits, Compliance Section

EPA Region 5 Records Ctr.

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Attachments

cc: Larry Eastep, IEPA Bill Radlinski, IEPA

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Motor Oils Refining Company ILD000646786 Additional Part B Information

1. Waste Analysis Plan

- a. Is the lab report on page 24, an E.P. toxicity analysis for metals or a total analysis for metals? If it is total, what would the E.P. toxicity be?
- b. What is the maximum percentage of water and/or solids allowed in a shipment (see page 25)?
- c. On page 26, when does the laboratory manager require the viscosity, flash point and spectrographic analysis (a first time shipment, a suspicious load, spot checks, etc.)?

2. Process Information

- a. What procedures are used to ensure the drums are "emptied" (by triple rinsing, scraping, etc.)?
- b. How often are the tanks checked for internal corrosion (annually, monthly, weekly, etc.)?
- c. What procedure would be followed if one tank is taken out of service and then a problem develops with the other tank?
- d. Please provide a cross-section of Unloading Station 1.
 - Does the truck sit on concrete or gravel?
 - 2) Does the ground slope to the collection sump?
 - 3) Is Station #1 diked?
- e. Where is the unloading station for Tank 100?.
- f. What is unloaded at Unloading Station #2? (see page 15.20)
- g. Is the area around Tank 100 & 101 diked? Please provide a diagram for the area if the answer is yes.
- h. What tank storage is used for the diesel engine oil? Where is it unloaded?

3. Closure Plans

a. Please provide a detailed closure plan for the Drum Unloading Area and all sumps.

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